

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

KYRA CANNING,
Plaintiff,

v.

Civil Action No.: 3:20-cv-401

WILLIAM SMITH, *et al.*,
Defendants.

JARROD BLACKWOOD, *et al.*, individually
and on behalf of a class of similarly situated
individuals,
Consolidated Plaintiffs,

v.

[Previously Civil Action No.: 3:20-cv-444]

JOHN/JANE DOES, I-X,
Consolidated Defendants.

BLACKWOOD PLAINTIFFS' MOTION TO DISMISS

Per Fed. R. Civ. Pro. 41(a)(2)

Comes now the *Blackwood v. Doe* plaintiffs, by counsel, and moves this Court to dismiss their claims with prejudice, pursuant to Fed. R. Civ. Pro. 41(a)(2), on the following terms:

- (a) The protective orders entered in this case at ECF Doc. 16 and 61 (incorporating ECF Doc. 58 by reference), are deemed modified pursuant to Rule 26(c) so that those orders shall expire as to the *Blackwood* plaintiffs effective on July 1, 2022.
- (b) The Court shall preserve its jurisdiction to enforce the provisions of the settlement contract between the plaintiff and the City of Richmond, pursuant to *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 381-82, 114 S. Ct. 1673, 1677 (1994).

The City of Richmond consents to this motion. The reasons for this motion are stated in the accompanying brief.

**Respectfully submitted,
Plaintiffs Jarrod Blackwood, Megan Blackwood,
Ryan Tagg, Christopher Gayler, and Keenan
Angel, by counsel**

By: /s/ Thomas H. Roberts
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CERTIFICATE OF SERVICE

I hereby certify that on the February 10, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send an electronic notification to all counsel of record who have appeared in this matter, including the following:

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